

The area affected by this impairment is the Wetmore/Hardscrabble region of CenturyLink's Florence wire center in Colorado. Several events have combined to cause an impairment of service to approximately 28 subscribers in that area that is still ongoing. This is a remote area located in a mountainous portion of Colorado that utilizes County Road 386 for telecommunications and other access. County Road 386 is on United States Forest Service ("USFS") land and is jointly maintained by Custer County and the federal government. In October 2016, a forest fire destroyed trees in the vicinity which led to increased erosion and greater vulnerability of the area to flooding from the creek. In the fall of 2017, a significant

rainstorm washed away portions of the fire-weakened mountainside, damaging the road as well as CenturyLink's fiber. Service was interrupted as result of that event but was able to be restored. On July 15, 2018, after periods of heavy rain similar to what was experienced in 2017, the road and adjacent forest area could not withstand the rains and approximately 1700 feet of County Road 386 was washed away taking the CenturyLink fiber cable with it. The destruction of CenturyLink's facilities that ran under County Road 386 resulted in the impairment of wireline telephone service to a limited number of customers.<sup>1</sup>

Since the event occurred, CenturyLink has been analyzing how best to restore reliable service to affected customers. The clearest path forward would be for CenturyLink to reinstall its facilities under the road upon rebuilding. However, at this point, it is unclear whether County Road 386 will be rebuilt and, if so, on what timeframe. The USFS is currently unable to rebuild its portion of the road, reportedly due to a lack of available funding. Moreover, even if the damaged portion of the road were to be fully rebuilt, without further improvements, the road may remain at risk for a similar washout event that stands to cause another service impairment. As such, CenturyLink is in the process of exploring other alternatives to restore service to the region. The mountainous terrain in this remote area, however, presents additional challenges to restoring reliable service and has contributed to the delay in implementing a plan to rebuild.

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<sup>1</sup> Wet Mountain Tribune, Phone Lines Are Still Dead for Wet Mountain Citizens, August 30, 2018, at 3 (attached as Exhibit A). *See also* [https://gazette.com/news/southern-colorado-highway-closed-after-flash-flooding-landslide/article\\_51c75ae0-88f2-11e8-8715-d7aa21686846.html](https://gazette.com/news/southern-colorado-highway-closed-after-flash-flooding-landslide/article_51c75ae0-88f2-11e8-8715-d7aa21686846.html) (visited September 17, 2018) (describing flooding event and damage to Highway 96 which is in the vicinity of County Road 386).

## **II. INFORMATION REQUIRED PURSUANT TO SECTION 63.63(a)**

### **A. Effective Date of Impairment and Service Areas Affected**

CenturyLink first started experiencing flood-related service outages on approximately July 15, 2018. As of this filing, CenturyLink has yet to restore service in limited portions of the Florence wire center. Approximately 28 customers in the Wetmore/Hardscrabble area are affected.

### **B. Nature and Estimated Duration of the Conditions Causing the Impairment**

The flooding that caused the service impairment on July 15, 2018 has subsided, but the portion of County Road 386 that was washed out has not been rebuilt and, as described above, due to circumstances outside of CenturyLink's control, there is no current timeframe for rebuilding.

### **C. Facts Showing That Such Conditions Could Not Have Been Reasonably Foreseen to Prevent Such Impairment**

CenturyLink has had facilities buried under County Road 386 for decades in order to serve customers in this portion of the Florence wire center. CenturyLink has never previously experienced flooding of this magnitude that resulted in a washout of the road and its facilities to this great extent. Additionally, CenturyLink could not have anticipated that the USFS would be unable to rebuild the portion of the roadway on its land. The flooding and resulting impairment of CenturyLink's services from this event was not foreseeable and could not have been reasonably prevented.

### **D. A Description of the Service Involved**

CenturyLink's wireline telecommunications services and other real-time two-way voice

communications services, as defined in Section 63.60(f) of the Commission's Rules, have been impaired in limited areas of the Florence, Colorado wire center.

**E. The Nature of Service Which Will Be Available or Substituted**

CenturyLink is currently analyzing options to restore service to the areas that were impaired by the flooding. Temporary service from CenturyLink is not available in the affected area due to the substantial stretch of roadway that was destroyed by flooding in July. Running a temporary service drop of that distance over rugged mountainous terrain is not feasible to provide reliable service since the drop would be relatively unprotected and therefore prone to damage. CenturyLink is still evaluating alternative means to restore service to affected customers. CenturyLink has offered call forwarding to affected customers free-of-charge for the duration of the outage.

**F. The Effect Upon Rates to any Person in the Community**

CenturyLink does not yet have enough information to state what effect this impairment may have upon the rates CenturyLink charges its customers in this area. Since CenturyLink is still evaluating how it will restore service and the expense restoral will entail, it is premature to state with any certainty what the effect on rates would be.

**G. Restoration Efforts**

Restoration efforts remain ongoing as CenturyLink evaluates its alternatives to restore service. CenturyLink has devoted substantial man-hours to restoring service that was impaired by the flooding. CenturyLink will continue to work diligently to rebuild its network and restore service to affected customers in the area. CenturyLink notes that the timing of service restoration is likely to depend on the reconstruction of critical infrastructure in the area, namely County Road 386. To the extent funding can be secured to fully rebuild County Road 386, this would present the clearest path forward to restore service. If rebuilding County Road 386 will

not move forward in a reasonable timeframe due to USFS's lack of funding or for other reasons, other options will need to be pursued. CenturyLink will continue to coordinate with other stakeholders and expects to have additional information regarding service restoral within the next 60 days.

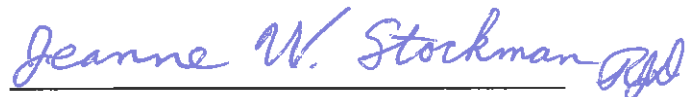
### **III. CONCLUSION**

For the foregoing reasons, in light of the devastating flooding and substantial damage to CenturyLink's facilities suffered in portions of the Florence, Colorado wire center, CenturyLink respectfully requests Commission approval of this Application.

Respectfully submitted,

**QWEST CORPORATION d/b/a  
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# Phone lines are still dead for Wet Mountain citizens

On Wednesday, August 22 many took the scenic drive down the Hardscrabble Pass to attend the open forum meeting concerning the loss of telephone coverage near County Road 386.

Commissioners Tom Flower, Bill Canda, and Jay Printz were in attendance. Abel Chavez, CenturyLink's Director for State and Local Affairs and his team were also important members of the community for the meeting. Also in house were representatives from the National Forest Service, Custer County Fire Service, and via conference call, Lynn from Public Utilities of Colorado. Many concerned and frustrated citizens of Custer County also showed up to voice their opinion.

The main issue of the meeting was that County Road 386 has had some fairly radical changes due to previous wildfires that combined with late summer rains, have

almost completely denuded the area. The mountaintop is now the mountainside, the southern creek has changed course, and CR 387 is now severed from Highway 165.

In regards to the telephone coverage, the local phone company, CenturyLink, provides service in and around the Wetmore/Hardscrabble area. Incidentally, the phone lines for a number of residents in the area run underneath CR 386. This means there has been a distinct lack of coverage due to the many challenges associated with the result of natural disasters.

Since July 15 an estimated 40 residents are affected by the outage caused by the after effects of the fires. Now 40 people may not seem like much, but nine of those residents are on various forms of a Life Alert system, and none of them can call 911 if they need to. Telephone service is a basic necessity for many people, and to have a service that was

previously available not working is a major cause for concern.

To complicate matters, while it is CenturyLink's phone line, part of the road is on National Forest land. The Forest Service is currently unable to rebuild its portion of the road. Even more frustrating, if the road were to be rebuilt, there is nothing to stop the rain from washing it all out again with the next downpour. CenturyLink is faced with a dilemma. Building a line by going overhead is extremely dangerous and costly; their other option is to reroute the line by going up Highway 96, but that goes through a lot of rock and is also costly. Extending the line that comes down from Westcliffe is also not possible because it's at capacity. ['Supposedly', Harry Buckle, ex-district manager claimed otherwise] In the immediate future, the solution is going to take time. The biggest concern is that time is a commodity

when multiple residents need Life Alert to live independent lives.

There are limited options to address the issue. There is a satellite provider HughesNet. At this time, however, HughesNet does not support Life Alert. In order for the satellites to work, a clear view of the southern sky and the receivers for the satellite transmissions are necessary - but they do not work when the power goes out. This prevents all residents from having a workable solution.

In the meantime, Undersheriff Chris Barr will be conducting a resident census to determine the full extent of those affected by the loss of phone service. If you are one of the residents in the area and have lost telephone service since July 15, please contact Chris Barr at the Custer County Sheriff's office or find a working phone and call 719-783-2270.

— Zakk Byers